

UNITED STATES DISTRICT COURT

for the
District of Maryland

BY

AUG 07 2014
AT BALTIMORE
CLERK, U.S. DISTRICT COURT
DISTRICT OF MARYLAND

DEPUTY

United States of America
v.
EDWARD KERMIT RICHARDS III

Case No.

14-1769SAG

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 6, 2014 in the county of Harford in the
District of Maryland, the defendant(s) violated:

Code Section

Offense Description

21 U.S.C. Section 841

Possession with intent to distribute 5 kilograms or more of a quantity of a mixture or substance containing a detectable amount of cocaine, a schedule II controlled substance.

21 U.S.C. Section 841

Possession with intent to distribute 1 kilogram or more of a quantity of a mixture or substance containing a detectable amount of heroin, a schedule II controlled substance.

This criminal complaint is based on these facts:

See attached affidavit

☒ Continued on the attached sheet.



Complainant's signature

Special Agent Eric S. Nye

Printed name and title

Sworn to before me and signed in my presence.

Date: August 7, 2014

City and state: Baltimore, Maryland



Judge's signature

Judge Stephanie A. Gallagher

Printed name and title

AFFIDAVIT OF ERIC S. NYE, SPECIAL AGENT
DEPARTMENT OF JUSTICE, FEDERAL BUREAU OF INVESTIGATION

14-1769SAG

I, ERIC S. NYE, being duly sworn, do hereby depose and state:

Introduction:

1. Your affiant is a Special Agent for the Department of Justice, Federal Bureau of Investigation (DOJ/FBI). I have been a Special Agent since 2006 and assigned to the Safe Streets Task Force (SSTF) of the Baltimore office of the FBI since 2008.

2. This affidavit is made in support of a complaint against Edward Kermit Richards III charging him with possession with intent to distribute, cocaine and heroin, in violation of 21 U.S.C. §841.

Summary of the Investigation:

3. This investigation began in June 2014 when your affiant received information from a confidential source of information (hereinafter SOI) concerning multi-kilogram shipments of cocaine and heroin being trafficked into Aberdeen, Maryland from Compton, California. Information provided by the SOI has been found to be both accurate and corroborated whenever possible by your affiant

4. Based on information provided by the SOI, your affiant and other members of the Baltimore SSTF, were able to determine that the individual that was driving shipments of narcotics from Compton, California to Aberdeen, Maryland, was Edward Kermit Richards III ("Richards").

Details of the Investigation:

5. On July 27, 2014, your affiant learned that Richards was scheduled to transport approximately 20 kilograms of cocaine and possibly four kilograms of heroin. Information provided by the SOI was that the narcotics would be hidden inside of a motor home with Louisiana plates. This motor home would be driven by Richards to a residence in Aberdeen, Maryland where it would be offloaded.


6. On August 6, 2014, as a result of the SOI's information, surveillance was established in the vicinity of the residence in Aberdeen, Maryland. Your affiant and other members of the SSTF observed a large motor home, bearing Louisiana plates, park on an access road adjacent to the residence. After a few minutes ~~inside of the parked motor home~~ ^{a safe} agents approached the motor home and detained Richards and his customer without incident. A search warrant, authorized by the Honorable Magistrate Judge Timothy Sullivan, United States District Court, District of Maryland, was then executed on the motor home.

7. During the search of the aforementioned motor home agents recovered approximately 25 kilograms of suspected cocaine and 6 kilograms of suspected heroin. Representative samples of the suspected narcotics were field-tested and confirmed to be cocaine and heroin.


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Conclusion:

Therefore, based on the facts set forth above, your affiant believes there is probable cause that Edward Kermit Richards III, of 6765 Tulip Falls Drive, Unit 2109, Henderson, Nevada, possessed with the intent to distribute five kilograms or more of cocaine, a Schedule II controlled substance, and one or more kilograms of heroin, a schedule I controlled substance, in violation of Title 21, United States Code, Section 841.


ERIC S. NYE, Special Agent
Department of Justice, Federal Bureau of Investigation

Subscribed and Sworn to before me and in my presence, this 7th day of August 2014, at Baltimore, Maryland.


Stephanie A. Gallagher
United States Magistrate